

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
BEAUFORT DIVISION

ALBERT WOLOGO,	)	Case No.: 9:17-cv-0157 DCN
	)	
Plaintiffs,	)	
	)	
vs.	)	PLAINTIFF' S ANSWERS TO
	)	RULE 26.01 INTERROGATORIES
TRANSAMERICA LIFE INSURANCE	)	
COMPANY and AEGON USA	)	
INVESTMENT MANAGEMENT,	)	
	)	
Defendant.	)	
_____	)	

NOW COMES the Plaintiffs, in the above-captioned and, pursuant to Rule 26.01 Federal Rules of Civil Procedure and shows this Court its Interrogatory responses as follows:

A. State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

ANSWER: None known.

B. As to each claim, state whether it should be tried jury or non-jury and why.

ANSWER: Jury as this case involves damages.

C. State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

ANSWER: No, all Plaintiffs are natural people.

D. State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

ANSWER: Plaintiff is a resident of Beaufort County South Carolina.

E. Is this action related in whole or part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which *may* be related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings or events, involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

ANSWER: No.

F. If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

ANSWER: Not applicable to Plaintiffs.

G. If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

ANSWER: Not applicable to Plaintiffs.

LAW OFFICE OF  
DARRELL THOMAS JOHNSON, JR.

s/Darrell Thomas Johnson, Jr.  
Fed ID#: 2190  
Post Office Box 1125  
Hardeeville, South Carolina 29927  
843-784-2142  
843-784-5770 (facsimile)  
tdjohnson1@hargray.com  
Attorneys for Plaintiffs

April 17, 2017